

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE: NATIONAL PRESCRIPTION OPIATE LITIGATION))))))	CASE NO. 1:17-MD-2804 JUDGE DAN A. POLSTER <u>RESPONSE TO NOTICE OF ARCOS DISCLOSURE</u>
---	----------------------------	---

In response to PEC’s Notice of ARCOS Disclosure to State AGs (ECF No. 510), the Drug Enforcement Administration (“DEA”) and Department of Justice (“DOJ”) state that they have no objection to the disclosure identified in the Notice, subject to each State AG that receives the data being bound by the Court’s Protective Order, as well as any and all amendments thereto. (ECF No. 167 at PageID # 940, ¶ 6(d).) This consent is specifically conditioned upon DEA and DOJ receiving, pursuant to the terms of the Protective Order, the following: (1) a list of all State AGs who receive the data, (2) a copy of the Protective Order Acknowledgement Form signed by each State AG who receives the data, (3) notice of any distribution of the data by any State AG to any other authorized individual(s), and (4) notice of, and the opportunity to object to, any public records request submitted to any State AG for the data.

Respectfully submitted,

DAVID A. SIERLEJA
First Assistant United States Attorney
Northern District of Ohio

/s/ James R. Bennett II
JAMES R. BENNETT II (OH #0071663)
KAREN E. SWANSON HAAN (OH #0082518)
Assistant U.S. Attorneys
Carl B. Stokes United States Courthouse
801 West Superior Avenue, Suite 400
Cleveland, Ohio 44113-1852
(216) 622-3988 (Bennett)
(216) 622-3851 (Swanson Haan)
E-mail: James.Bennett4@usdoj.gov
E-mail: Karen.Swanson.Haan@usdoj.gov

ALEXANDER K. HAAS
Special Counsel to the Assistant AG, Civil Division
ALICE SHIH LACOUR
ERIC J. SOSKIN
Counsel to the Assistant AG, Civil Division
United States Department of Justice
950 Pennsylvania Ave., NW
Washington, DC 20530
(202) 353-8679 (Haas)
(202) 514-3180 (LaCour)
(202) 514-1500 (Soskin)
E-mail: alex.haas@usdoj.gov
E-mail: alice.s.lacour@usdoj.gov
E-mail: eric.soskin@usdoj.gov

CERTIFICATE OF SERVICE

I certify that, on May 31, 2018, I filed a copy of the foregoing electronically. The Court's electronic filing system will send notice of this filing to all parties. Parties may access this filing through the Court's system.

/s/ James R. Bennett II

JAMES R. BENNETT II

Assistant U.S. Attorney

Attorney for the United States of America